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BLUE SHIELD OF CALIFORNIA

THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

KENNETH P. and NATASIA P.,  Plaintiffs,  vs.  BLUE SHIELD OF CALIFORNIA,  Defendant.	Civil No. 2:18-cv-00034 BSJ  <b>DECLARATION OF LESLIE CRAWFORD IN SUPPORT OF MOTION TO TRANSFER VENUE UNDER THE DOCTRINE OF <i>FORUM NON CONVENIENS</i></b>  Judge Bruce S. Jenkins
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## **DECLARATION OF LESLIE CRAWFORD**

I, Leslie Crawford, declare as follows:

1. I have worked for defendant California Physicians' Service dba Blue Shield of California ("Blue Shield") for approximately 45 years. I am currently a litigation specialist with Blue Shield. This declaration is submitted in support of Blue Shield's motion to transfer venue under the doctrine of *forum non conveniens*. I have personal knowledge of the following facts. If called as a witness in this action, I could and would testify competently to these facts.

2. I am familiar with and have access to records concerning Blue Shield's members and the terms of their coverage. I am also familiar with and have access to Blue Shield's records relating to the requests for authorization and claims it receives and processes for individuals covered under Blue Shield health plans, as well as the records from Blue Shield's Appeals and Grievances Department relating to member appeals from denials of their requests for authorization or claims.

3. In 2014-16, Plaintiffs had health coverage under a Full PPO group health plan that was issued by Blue Shield to the TriNet Group, Inc., a professional employer organization. Attached as Exhibits A and B are true and correct copies of the Summary of Benefits and Evidence of Coverage ("EOC") that were in effect from October 1, 2014 to September 30, 2015 (Exhibit A) and from October 1, 2015 to September 30, 2016 (Exhibit B).

4. Kenneth is employed by a California corporation, which sponsored the group health plan. I am informed and believe that Kenneth's employer is a closely held corporation.

5. Blue Shield issued and administered Plaintiffs' health plan in California. Blue Shield also made its benefits determinations regarding Plaintiffs' request for services in California.

6. Under Plaintiffs' plan, when Plaintiffs receive medical services from an out-of-network provider, Blue Shield's payment obligation is to Plaintiffs, not to the out-of-network provider.

I declare under penalty of perjury under the laws of the United States that the contents of this Declaration are true and correct, and that this Declaration was executed by me on May 25, 2018 in San Francisco, California.



Leslie Crawford